

Posted: December 3, 2013

New York City Department of Education Assessment of 2013-14 Contracts for Excellence Public Comment

Public Comment Timeline

July 26, 2013	In anticipation of the 2013-2014 Contracts for Excellence (C4E) process, all CECs (Community Education Councils) and the Citywide Council on High Schools (CCHS) received an email requesting that C4E be placed on the agenda of a public meeting falling between August and October. All CECs and the CCHS received an email regarding the need to schedule C4E presentations to fit the public hearing timeline – August 27 to October 18.
August 5, 2013	The preliminary 2013-2014 C4E plan was released and all CEC meeting dates which had been confirmed at the time were posted on the DOE's website, initiating the public hearing and public comment period, which, according to State Education Department (SED) regulations, must be at least 30 days in length.
August 27 – October 18, 2013	33 public hearings were held. The full schedule of C4E hearings can be found here: 2013-2014 Public Hearing Calendar . Please note that C4E statute and regulations require that NYC hold at least one C4E hearing per borough . NYCDOE went beyond this requirement by holding one hearing per district—resulting in multiple hearings in the Bronx, Brooklyn, Manhattan, and Queens; and one hearing in Staten Island. Public hearing transcripts are available here: Public Comment Assessment (Note that some of the CEC meetings do not have a transcript, due to technical problems with recordings and instances in which there were no public comments to record.)
October 18, 2013	Public comment period concluded
December 3, 2013	Assessment of public comments released on DOE website

Overview of Public Comment Period

From August 27th to October 18th, 2013, the New York City Department of Education held hearings in each of the 32 community school districts and one hearing for the CCHS to discuss the City's and their individual district's preliminary 2013-2014 Contracts for Excellence proposal. Additionally, during this same period, the public was given the opportunity to submit written comments on that initial plan in several ways, including a specially designated email address: contractsforexcellence@schools.nyc.gov.

The public comment period associated with the updated plan yielded over 40 emails to the contractsforexcellence@schools.nyc.gov address as well as written comments submitted in conjunction with oral testimony given at the 33 public hearings. A summary of the substance of comments received is provided below, along with the DOE's responses.

The NYC Department of Education thanks all parents, students, community members, superintendents, school employees and CEC members who took time to participate in the 2013-2014 Contracts for Excellence public engagement process.

Summary of Questions, Comments and Concerns

Category: Public Hearing Process

Topic:	Hearings
Substance of Comments:	<ol style="list-style-type: none"> 1. DOE has refused to hold borough meetings since 2008 2. While the timing of the “public hearing” was earlier than the last year, it was still held after the school budgets have been allocated with much of the funds obligated, rendering any public input meaningless as in the past 3. We do not understand why public comments were not solicited when budgets were in development
DOE Response:	<ol style="list-style-type: none"> 1. DOE is fully committed to holding productive public hearings where parents, teachers, and members of the community may freely express opinions and concerns in relation to how the City’s and their District’s C4E dollars are spent. Holding hearings in each district allows the public greater opportunities to learn about and comment on both the City plan and the District plan and goes well beyond the statutory requirement of holding one public hearing in each borough. 2. The citywide C4E presentation was posted on the DOE website on August 5th. District-specific presentations were distributed to CECs prior to each CEC’s scheduled meeting. The comment process was open for over 30 days, which gave parents and community members additional time to provide substantive feedback if they were unable to do so at the actual CEC meetings. Although initial budgets were made, the scheduled budgets are preliminary. The budget process is organic and the budget can change during the course of the year. Comments received may inform expenditures for this year or, alternatively, planning for next year’s budget. 3. As stated in the C4E presentations, the allocations are preliminary and subject to public comments and SED approval.

Category: Allocations

Topic:	School Allocations
Substance of Comments:	<ol style="list-style-type: none"> 1. Is parent input important when allocating funds or is it just the principal’s judgment? 2. Can the budgeted amount for Teacher/Principal Quality Initiative funds be decreased as Common Core phases in each year and amounts put back into programs/academic areas teachers? 3. Is there any evidence or indication that the amount that’s been allocated is actually sufficient to meet the needs of the students that these funds are to be targeted at?
DOE Response:	<ol style="list-style-type: none"> 1. Parent/School Leadership Team (SLT) input is very important when principals schedule the budget for the school year. Principals confer with SLTs to determine how school budgets are allocated every year. 2. Schools are required to allocate their C4E dollars within the eligible program areas allowed under the C4E regulations: reducing class size; increasing student time on task; improving teacher and principal quality; restructuring middle and high schools; expanding access to full-day pre-kindergarten; or supporting model programs for English language learners (ELLs). 3. The impact of C4E funds cannot be disaggregated from the impact of other funding sources and other changes in instructional and operational policies. While we cannot show a direct correlation to achievement, schools identified by SED as in the “Top 50% of Need” for the purposes of C4E allocations have experienced gains in student achievement.

Topic:	Use of C4E Funds
Substance of Comments:	<ol style="list-style-type: none"> DOE officials have refused to allocate a single penny of the more than \$500 million they are awarded each year in state C4E funds towards reducing class size Also, upsetting was the fact the Network told the SLT that from now on the C4E funds would have to be designated to specific criteria spending instead of used as a 'slush fund' as in the past
DOE Response:	<ol style="list-style-type: none"> In FY14, nearly \$149 million, or 43%, out of the \$348 million discrete C4E funds were dedicated to class size reduction. Schools are required to allocate their C4E dollars within the eligible program areas allowed under the C4E regulations: reducing class size; increasing student time on task; improving teacher and principal quality; restructuring middle and high schools; expanding access to full-day pre-kindergarten; or supporting model programs for English language learners (ELLs). C4E funds are never considered as part of a 'slush fund'.

Category: Budget

Topic:	Transparency of spending
Substance of Comments:	<ol style="list-style-type: none"> How much of this information, school budget and C4E funds is shared with the SLT or should be shared with the SLT? How can we find out if the money is actually being spent correctly?
DOE Response:	<ol style="list-style-type: none"> As is the case for all school budgeting, the principal in consultation with the SLT determines how C4E funds will be spent across the eligible categories. Like any other funding source in a school's budget, C4E funds are utilized by principals in accordance with statutory and regulatory requirements and following consultation with their SLTs. After the money has been budgeted, adjustments and assessments are made throughout the school year. Schools are supported and monitored by their networks to ensure that funds are spent appropriately.

Category: Class Size Reduction

Topic:	Class Size Reduction
Substance of Comments:	<ol style="list-style-type: none"> Many of our schools continue to have class sizes that are higher than the target class sizes of the City's Class Size Reduction Plan Can 2 teachers be in one gen. ed. class to reduce class size? Why isn't reduced class size for gifted students? How do we update the blue book? The one that is used to evaluate school size The DOE also eliminated its early grade class size funding program, even though they promised to retain it as part of their original C4E plan This year's "pre-approved" class size reduction plan requires only that in 75 schools out of more than 1500, class size should not increase more than half of the amount class sizes increase citywide. By no definition and by no reasonable standard does this constitute a class size reduction plan, and by no means will it lead to "measurable progress" in lowering class size Putting an extra teacher in a large class room may qualify as class size reduction but actually doesn't
DOE Response:	<ol style="list-style-type: none"> For the past several years, the level of C4E funding has decreased while at the same time there have been automatic salary increases due to longevity and educational attainment. This means that more funds are needed to maintain the same number of teachers as the prior year. Instead of receiving more money, the NYC school district has received less in C4E funding. 2 teachers may co-teach in a CTT/ICT classroom. These classrooms reduce the pupil-teacher ratio and are an allowable program under efforts to reduce class size. The law requires that "Districts must target funds to students with the greatest educational needs, including but not limited to students with disabilities, students with limited English proficiency or who are English language learners, students living

	<p>in poverty, and students with low academic achievement and give priority to schools serving concentrations of such students”</p> <ol style="list-style-type: none"> 4. It is important to point out that the Blue Book doesn't use or calculate either target or actual class size. Instead, the Blue Book calculation refers to maximum classroom capacity, which represents the DOE's aspirational goal on the number of seats to be provided in a classroom. Moreover, the Blue Book calculation assumes standard programming practice. Principals might choose to program differently and have a bigger or smaller class size. The Blue Book is based on information provided by the principals on how each and every room is used in school facilities. 5. Grant funding under the New York State Early Grade Class Size Reduction (EGCSR) Program was discontinued after the 2006-2007 school year. System-wide, DOE used State EGCSR funds, plus significant additional funding from federal grants and local tax levy, to produce a meaningful and steady decline in average class sizes in grades K-3. 6. The 75 schools listed in this year's class size reduction plan represent a cross-section of schools throughout the city displaying high average class size, low student performance, and a building utilization rate of less than 100%. These schools represent some of the highest need schools in the city. The limited C4E dollars that NYCDOE receives is not enough to provide meaningful reduction in all schools within the city, so schools fitting the criteria were targeted to receive extra funding to support class size reduction. The list is evaluated yearly and schools may be added or removed depending on eligibility. 7. An extra teacher in a large class room reduces the pupil-teacher ratio. This provides more individualized attention for students and maximizes limited resources and space.
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Category: C4E Programs

Topic:	AP Courses
Substance of Comments:	1. Are Advanced Placement (AP) courses during the school day or before or after school?
DOE Response:	1. AP courses generally take place during the school day. The law requires that “Districts must target funds to students with the greatest educational needs, including but not limited to students with disabilities, students with limited English proficiency or who are English language learners, students living in poverty, and students with low academic achievement and give priority to schools serving concentrations of such students”. Funding is provided for College and AP related services that include students who fall into one or more of these categories.